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Attorneys for Defendants WILLIAM ADAMS; STACY FERGUSON; ALLAN PINEDA; and JAIME GOMEZ, all individually and collectively as the music group THE BLACK EYED PEAS; will.i.am music, llc; TAB MAGNETIC PUBLISHING; CHERRY RIVER MUSIC CO.; HEADPHONE JUNKIE PUBLISHING, LLC; JEEPNEY MUSIC, INC.; EMI APRIL MUSIC, INC.

UNITED STATES DISTRICT COURT**CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

BRYAN PRINGLE, an individual,

Plaintiff,

v.

WILLIAM ADAMS, JR.; STACY FERGUSON; ALLAN PINEDA; and JAIME GOMEZ, all individually and collectively as the music group the Black Eyed Peas; DAVID GUETTA; FREDERICK RIESTERER; UMG RECORDINGS, INC.; INTERSCOPE RECORDS; EMI APRIL MUSIC, INC.; HEADPHONE JUNKIE PUBLISHING, LLC; WILL.I.AM. MUSIC, LLC; JEEPNEY MUSIC, INC.; TAB MAGNETIC PUBLISHING; CHERRY RIVER MUSIC CO.; SQUARE RIVOLI PUBLISHING; RISTER EDITIONS; and SHAPIRO, BERNSTEIN & CO.,

Defendants.

Case No. SACV10-1656 JST (RZx)

Hon. Ralph Zarefsky
 Courtroom 540

DISCOVERY MATTER**DECLARATION OF JONATHAN S. PINK IN SUPPORT OF DEFENDANTS' SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF MOTION TO COMPEL**

Date: January 23, 2012
 Time: 10:00 a.m.

Pretrial Conf.: March 12, 2012
 Trial Date: March 27, 2012

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DECLARATION OF JONATHAN S. PINK

I, Jonathan S. Pink, declare:

1. I am an attorney duly licensed to practice law before the courts of the State of California and all federal courts in the State of California. I am an attorney with the law firm of Bryan Cave LLP, counsel of record for Defendants WILLIAM ADAMS; STACY FERGUSON; ALLAN PINEDA; and JAIME GOMEZ, all individually and collectively as the music group THE BLACK EYED PEAS; will.i.am music, llc; TAB MAGNETIC PUBLISHING; CHERRY RIVER MUSIC CO.; HEADPHONE JUNKIE PUBLISHING, LCC; JEEPNEY MUSIC, INC.; and EMI APRIL MUSIC, INC. ("Defendants"). I have personal knowledge of the matters set forth in this Declaration and, if called upon to testify regarding such matters, I could and would competently do so.

2. On December 20, 2011, Defendants took the deposition of David T. Gallant. Attached hereto as **Exhibit "1"** are true and correct copies of excerpts of Mr. Gallant's deposition.

3. Email correspondences with Mr. Gallant were marked as Exhibit 59-A during his deposition. Attached hereto as **Exhibit "2"** is a true and correct copy of Exhibit 59-A to Mr. Gallant's deposition, authenticated at page 196:11-23 of Exhibit 1.

4. On or about November 9, 2011, we received Plaintiff's Amended Answers to Defendant Headphone Junkie Publishing, LLC's First Set of Interrogatories. Attached hereto as **Exhibit "3"** is a true and correct copy of Plaintiff's Amended Answers to Defendant Headphone Junkie Publishing, LLC's First Set of Interrogatories.

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I declare under penalty of perjury under the laws of the State of California
and the United States of America that the foregoing is true and correct.

Executed this 9^h day of January, 2012 at Irvine, California.

/s/ Jonathan Pink
Jonathan S. Pink